

Exhibit G

Kary Seminerio

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Knight, et al. v. The Islamic Republic of Iran</i>	18-cv-12398 (GBD)(SN) ECF Case

DECLARATION OF KARY SEMINERIO

I, Kary Seminerio, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than eighteen (18) years of age and I have personal knowledge of and am competent to testify to the matters stated in this declaration.
2. I was a citizen of the United States on September 11, 2001, and I remain so today.
3. On September 11, 2001, I was present near New York City when the terrorist attacks on the World Trade Center (WTC) occurred.
4. On the morning of September 11, 2001, I was a member of the Cresskill, New Jersey Volunteer Fire Department. I was at home and learned that a plane had hit the WTC. I turned on the television and watched as the first tower fell. Our Chief contacted the County Fire Coordinator. We were directed to go to the firehouses and prepare to go into the City.
5. We left the firehouse and proceeded toward New York City. We arrived at the George Washington Bridge in Fort Lee, New Jersey where we were stopped by law enforcement and directed not to enter the city. Instead, we were staged on the New Jersey side of the bridge and told to wait for anyone coming out of New York who might need assistance. We could not see the WTC from where we were staged, but we could see the smoke coming from City. We waited at that location until 9:00 p.m. No one ever came across the bridge.

6. The following morning, September 12, we were asked to go Staten Island, New York to the Fresh Kills Landfill where the debris from the WTC attacks was being brought by barges and trucks. Our orders were to cut the emergency vehicles apart with the "jaws of life" to determine if there were any people inside the firetrucks and ambulances that had been crushed at Ground Zero the previous day.

7. Everything that was being deposited at the landfill was covered with thick layers of dust of and ash. The area had a very strange smell that I associated with the smell of death. As we cut through the emergency vehicles, we found some which contained human remains. A vivid memory of this is of a firetruck that I cut into where a pair of boots fell out. The persons feet were still in the boots and nothing else.

8. I continued to work at Fresh Kills with my department for a month following 9/11. We ended up cutting and searching through non-emergency vehicles, as well as those of first responders that had been destroyed on day of the attacks.

9. During the month I worked at the landfill, I had no protective equipment other than gloves and boots. We were told that masks and other protective equipment were unnecessary by law enforcement officials on site. I was used to being hot and exposed to smoke from fighting fires, so I did not give much thought to the fact that being in that dust and ash-laden environment was causing me to cough and was affecting my eyes, nose, and throat. I also attributed difficulty breathing with the fact that the work was very physical and the temperatures were very warm. After working at the site for a month, on the day we left I saw people wearing Tyvek suits and masks for the first time.

10. When what I assumed would be short term problems with my nose, throat, and lungs did not go away, I sought medical treatment. The breathing and other respiratory problems

that developed following my exposure to the environment at Fresh Kills Landfill continue to persist today.

11. As a result of my exposure to the chemicals, dust, and ash at Fresh Kills Landfill in the month following 9/11, I have continued to suffer from medical issues. As previously stated, I sought medical treatment after 9/11 and am still being treated for difficulty breathing related to asthma and COPD, and problems with my nose and throat.

12. My physical injuries and conditions have been confirmed through the World Trade Center Health Program (WTCHP) and determined to be eligible for compensation by the Victim Compensation Fund (VCF).

13. I continue to seek medical treatment for the injuries I suffered in the immediate aftermath of 9/11. Following the evaluation of my conditions by the WTCHP, I pursued a claim with the VCF and was found eligible for compensation for asthma, chronic bronchitis and sinusitis. A true and correct copy of the VCF eligibility determination letter documenting the physical injuries I suffered as a result of the attacks on 9/11 is submitted with this Declaration as part of this exhibit.

I DECLARE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 24 day of March, 2025.


Declarant Kary Seminerio



September 11th
Victim Compensation Fund

December 7, 2018

KARY SEMINERIO

Dear KARY SEMINERIO:

The September 11th Victim Compensation Fund ("VCF") has reviewed your Eligibility Form. Your claim number is VCF0013783. Your Eligibility Form was determined to be substantially complete on December 06, 2018. As stated in the regulations and on the claim form, by filing a substantially complete Eligibility Form you have waived your right to file or be a party to a September 11th-related lawsuit.

The Decision on your Claim

The VCF has determined that you meet the eligibility criteria established in the statute and regulations. Based on the information you submitted and information the VCF has received from the World Trade Center ("WTC") Health Program, you have been found eligible for the following injuries:

- ASTHMA, UNSPECIFIED, UNSPECIFIED STATUS
- SIMPLE CHRONIC BRONCHITIS
- UNSPECIFIED SINUSITIS

Please note that there are several reasons why an injury that you think should be eligible is not listed above. For non-traumatic injuries, the name of the injury is based on the information provided by the WTC Health Program and there may be different names for the same injury. Additionally, your injury may not be listed if it was only recently certified for treatment by the WTC Health Program.

If in the future the WTC Health Program should notify you that a condition previously found eligible is no longer certified, you must inform the VCF as this may affect your eligibility status and/or the amount of your award.

What Happens Next

If you have been certified for treatment by the WTC Health Program for a condition not listed above, you should amend your claim. Please see the VCF website for details on how to amend your claim. The VCF will review the new information and determine if it provides the basis for a revised decision.

If you believe you have eligible injuries that are not being treated by the WTC Health Program and you would like the VCF to consider those injuries before calculating your award,



September 11th
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you should amend your claim. If you choose to amend your claim, you must first seek certification for the condition(s) from the WTC Health Program. Seeking certification for your condition provides the VCF with the necessary evidence that the condition is eligible for compensation. Please note, however, that because additional certifications do not necessarily impact the amount of your award, we recommend that you wait to receive your award letter to determine whether to seek certification for any additional condition(s).

If you do not have injuries other than those listed above, you should submit your Compensation Form and required supporting materials. If you have already submitted your Compensation Form, you do not need to take any action at this time unless you receive a request from the VCF for missing information. The VCF will calculate the amount of any compensation based on the conditions listed above after all compensation-related documents are submitted.

If you have questions about the information in this letter or the claims process in general, please call our toll-free Helpline at 1-855-885-1555. For the hearing impaired, please call 1-855-885-1558 (TDD). If you are calling from outside the United States, please call 1-202-514-1100.

Sincerely,

Rupa Bhattacharyya
Special Master
September 11th Victim Compensation Fund

cc: KARY SEMINERIO